

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
	§	
The State of Texas	§	CIVIL ACTION NO. 2:21-CV-
<i>ex rel.</i> ALEX DOE, Relator,	§	00022-Z
	§	
	§	Date: November 10, 2022
	§	
The State of Louisiana	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	
	§	
Planned Parenthood Federation of America, Inc.,	§	
Planned Parenthood Gulf Coast, Inc., Planned	§	
Parenthood of Greater Texas, Inc., Planned	§	
Parenthood South Texas, Inc., Planned Parenthood	§	
Cameron County, Inc., Planned Parenthood San	§	
Antonio, Inc.,	§	
	§	
Defendants.	§	
	§	
	§	
	§	

**PLANNED PARENTHOOD GULF COAST, INC.’S UNOPPOSED
MOTION TO EXPEDITE BRIEFING OF AFFILIATE DEFENDANTS’ MOTION TO
QUASH DEPOSITION NOTICE OF MELANEY LINTON [ECF 268]**

On November 10, 2022, Planned Parenthood Gulf Coast, Inc. (“PPGC”) filed a Motion to Quash the Deposition Notice of Melaney Linton.

Relator noticed the deposition for November 22, 2022, a date on which Ms. Linton is unavailable. As described more fully in PPGC’s Motion to Quash, PPGC informed Relator on October 18, 2022 that Ms. Linton was not available during the month of November and proposed several alternative dates since October 18. Most recently, on November 4, PPGC reiterated its offer to present Ms. Linton on three different alternative dates within the timeframe that the parties are scheduling depositions in this case. On the evening of November 8, 2022, Relator informed PPGC that they would not agree to any of the proposed alternative dates and that if Ms. Linton “fails to show for her scheduled deposition, she and PPGC will be subject to sanctions under FRCP 37.” In a final effort to avoid motions practice, PPGC offered to present Ms. Linton during a pre-existing business trip on November 28 (the first date Relator had selected for Ms. Linton’s deposition) in Washington, D.C. (where Relator will already be for other depositions that week). Relator responded that PPGC “can present Ms. Linton on the 22nd or seek a protective order.” At no point on November 8 did Relator identify any reason that they are unable to depose Ms. Linton on November 28.

The Court has previously ordered expedited briefing for discovery disputes. *See, e.g.*, ECF Nos. 159, 232. November 22, 2022 is twelve days from today and two days before Thanksgiving. The parties have agreed to an aggressive schedule in which over 25 depositions to take place between today and December 9, 2022.¹ All parties would benefit from a prompt decision on

¹ The parties have scheduled several depositions for the week of December 5 and have agreed that the taking of these depositions will not impact the dispositive motions deadline or the trial date.

whether Ms. Linton will be required to change her pre-existing travel plans in order to appear on November 22.

For the foregoing reasons, PPGC respectfully requests that the Court expedite briefing. PPGC proposes that the Court order the Relator to respond to the Motion to Quash by November 12, 2022 and PPGC to file any reply by November 14, 2022.

Dated: November 10, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

By: Tirzah S. Lollar
Craig D. Margolis
Craig.Margolis@arnoldporter.com
Tirzah S. Lollar
Tirzah.Lollar@arnoldporter.com
Christian Sheehan
Christian.Sheehan@arnoldporter.com
Emily Reeder-Ricchetti
Emily.Reeder-Ricchetti@arnoldporter.com
Megan Pieper
Megan.Pieper@arnoldporter.com
Alyssa Gerstner
Alyssa.Gerstner@arnoldporter.com
601 Massachusetts Ave, NW
Washington, DC 20001-3743
Telephone: +1 202.942.6127
Fax: +1 202.942.5999

Christopher M. Odell
Texas State Bar No. 24037205
Christopher.Odell@arnoldporter.com
700 Louisiana Street, Suite 4000
Houston, TX 77002-2755
Telephone: +1 713.576.2400
Fax: +1 713.576.2499

Ryan Patrick Brown
Texas State Bar No. 24073967
brown@blackburnbrownlaw.com
1222 S. Fillmore
Amarillo, TX 79101
Tel: (806) 371-8333
Fax: (806) 350-7716

*Attorneys for Defendants Planned
Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County,
and Planned Parenthood San Antonio*

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar

Tirzah S. Lollar